

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GREAT WESTERN INSURANCE COMPANY,

Plaintiff,

v.

MARK GRAHAM, DONALD SOLOW, BLUE CAPITAL
MANAGEMENT, INC., BLUE ALTERNATIVE ASSET
MANAGEMENT LLC, WILMINGTON SAVINGS FUND
SOCIETY, FSB, CHRISTIANA TRUST, REGATTA
HOLDINGS LLC, CYGNET 001 MASTER TRUST,
CYGNET 001 MASTER TRUST SERIES 2011-A,
CYGNET 001 MASTER TRUST SERIES 2011-C,
CYGNET 001 MASTER TRUST SERIES 2013-A,
ALPHA RE LIMITED, ALPHA RE HOLDINGS
(CAYMAN) LIMITED, ATLANTIC SPECIALTY
FINANCE, BLUE ELITE FUND LTD., BLUE ELITE
FUND LP, BLUE II LTD., SANCUS CAPITAL BLUE
CREDIT OPPORTUNITIES FUND LTD., ABILITY
INSURANCE COMPANY, JOHN DRAKE, EDWARD
BRENDAN LYNCH, AND GREGORY TOLARAM,

Defendants.

Hon. Vernon S. Broderick

No. 18 CV 6249 (VSB)

ECF Case

**RULE 7.1 DISCLOSURE
STATEMENT**

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel for defendants, Cygnet 001 Master Trust, Cygnet 001 Master Trust Series 2011-A, Cygnet 001 Master Trust Series 2011-C, and Cygnet 001 Master Trust Series 2013-A (collectively, the “Cygnet Defendants”) certifies that the Cygnet Defendants are a Delaware statutory series trust formed by the execution of a trust agreement and the filing of a certificate of trust with the Secretary of State of Delaware in compliance with the provisions of the Delaware Statutory Trust Act. This statutory series trust has no parent corporation nor has it issued any stock (and thus no publicly held corporation owns 10% or more thereof).

BAKER & HOSTETLER LLP

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Cygnet 001 Master Trust Series 2011-A,
Cygnet 001 Master Trust Series 2011-C, and
Cygnet 001 Master Trust Series 2013-A*